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Steven J. Glaser
Vice President
Energy Services

September 4, 1996

Mr. Gary Yaquinto, Director
Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED

SEP 5 1996

Re: First Draft of Proposed Rule on Retail Electric Competition
Docket No. U-0000-94-165

DOCKETED BY

RT

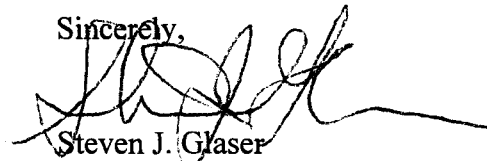
Dear Mr. Yaquinto:

Tucson Electric Power Company ("TEP" or "Company") is in receipt of the First Draft of the Proposed Rule on Retail Electric Competition ("Proposed Rule") and appreciates the opportunity to submit its comments to Staff. Staff has requested that comments be filed with Docket Control on or before September 12, 1996. The Company received the Proposed Rule via facsimile transmission on Wednesday, August 28. This only provides the Company ten business days to review the Proposed Rule and submit comments.

Since the Proposed Rule will dramatically restructure the electric energy industry in Arizona and materially affect TEP from an operational, financial and competitive perspective, the Company respectfully requests additional time to submit comments. Although the Company realizes that there will be additional opportunity to comment in the future, TEP has been an active participant in the Restructuring Docket and would prefer that its concerns be considered by Staff prior to submittal of the definitive Proposed Rule to the Commission. Therefore, TEP requests that the deadline for filing comments be extended until September 27, 1996.

If you would like to discuss this further, please do not hesitate to call me.

Sincerely,



Steven J. Glaser
Vice President, Energy Services

cc: Renz Jennings, Chairman
Marcia Weeks, Commissioner
Carl Kunasek, Commissioner
Docket Control